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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

U-Haul International, Inc., a Nevada corporation; eMove, Inc., a Nevada corporation,

Plaintiffs,

V.

Hire a Helper, LLC, a California limited liability company; Michael Glanz and Amy Glanz, husband and wife; John and Jane Does I - X; ABC Partnerships I - X; XYZ Corporations I - X,

Defendants.

**IN RELATION TO PLAINTIFFS'
APPLICATION FOR PRELIMINARY
INJUNCTION:**

**PLAINTIFFS' MOTION TO SUBMIT
CERTAIN CONFIDENTIAL
INFORMATION AND TRADE
SECRETS UNDER SEAL**

17 Plaintiffs U-Haul International and eMove, by and through counsel undersigned,
18 hereby request leave of Court for its order permitting Plaintiffs to file certain confidential
19 information under seal. *Johnson Controls, Inc. v. Phoenix Control Systems, Inc.*, 886
20 F.2d 1173, 1176-77 (9th Cir. Ariz. 1989). This confidential information includes and is
21 not limited to, certain trade secrets, business know how, business practices, codes,
22 capabilities, systems, strategies, marketing information, financial information, software
23 technologies, process, procedures, methods and applications including intellectual
24 property information relevant to Plaintiffs' Application for Preliminary Injunction filed
25 herewith under separate cover. It is appropriate for the Court to permit the filing of
26 certain records under seal where such records contain and/or implicate proprietary

1 information and trade secrets. *GATOR.COM Corp. v. L.L .Bean, Inc.*, 398 F.3d 1125,
2 1128, fn 2 (9th Cir. CA 2005). *See also Barnett v. Centoni*, 31 F.3d 813, 816, fn 3 (9th
3 Cir. CA 1994)(Motion for *in camera* review of confidential report granted); *Johnson*
4 *Controls, Inc. v. Phoenix Control Systems, Inc.*, 886 F.2d 1173, 1176-77 (9th Cir. Ariz.
5 1989)(Submitting documents to district court under seal is a proper procedure in cases
6 involving trade secrets); *Henry Hope X-Ray Products, Inc. v. Marron Carrel, Inc.*, 674
7 F.2d 1336, 1343 (9th Cir. 1982)(Documents containing trade secrets properly submitted to
8 the district court under seal).

9 The documents will not be filed until the Court has ruled on this motion.

10 *GATOR.COM Corp. v. L.L .Bean, Inc.*, 398 F.3d 1125, 1128, fn 2 (9th Cir. CA 2005)

11 A proposed form of Order is submitted herewith.

12 DATED this 10th day of July, 2008.

13 BROENING OBERG WOODS & WILSON, P.C.

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